

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AHMAD JAVON LANE, an individual,

Plaintiff,

-against-

BEYONCÉ KNOWLES CARTER; PARKWOOD
ENTERTAINMENT; and COLUMBIA
RECORDS,

Defendants.

Civil Action No. 1:14-CV-06798-PAE

**NOTICE OF MOTION TO
DISMISS PLAINTIFF'S
AMENDED COMPLAINT**

PLEASE TAKE NOTICE, that upon the annexed Declaration of Ilene S. Farkas, Esq. and exhibits attached thereto, and the accompanying Memorandum of Law, Defendants Beyoncé Giselle Knowles-Carter and Parkwood Entertainment, LLC (collectively, "Defendants"), shall move this Court, before the Honorable Paul A. Engelmayer at the Thurgood Marshall United States Courthouse, Courtroom 1305, 40 Foley Square, New York, New York, 10007, on July 17, 2015 at a time to be directed by the Court, for an Order dismissing Plaintiff Ahmad Javon Lane's Amended Complaint for failure to state a claim for relief under Rules 8(a) and 12(b)(6) of the Federal Rules of Civil Procedure, with prejudice. The reasons and grounds for Defendants' motion are more fully described in the accompanying Memorandum of Law in support of this motion.

Dated: New York, New York
June 4, 2015

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